# IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In re:	Chapter 11
BIG LOTS, INC., et al.,	Case No. 24-11967 (JKS)
Debtors. <sup>1</sup>	(Jointly Administered)

# NOTICE OF AGENDA FOR HEARING SCHEDULED FOR MARCH 25, 2025, AT 10:00 A.M. (ET)

This proceeding will be conducted **in-person**. All counsel and witnesses are expected to attend unless permitted to appear remotely via Zoom.

Please refer to Judge Stickles' Chambers Procedures (<a href="https://www.deb.uscourts.gov/judge-j-kate-stickles">https://www.deb.uscourts.gov/judge-j-kate-stickles</a>) and the Court's website (<a href="http://www.deb.uscourts.gov/ecourt-appearances">https://www.deb.uscourts.gov/ecourt-appearances</a>) for information on who may participate remotely, the method of allowed participation (video or audio), Judge Stickles' expectations of remote participants, and the advance registration requirements.

Registration is required by 4:00 p.m. (Prevailing Eastern Time) the business day before the hearing unless otherwise noticed using the *eCourtAppearances* tool available on the Court's website.

## **RESOLVED MATTERS**

1. SquareTrade Inc.'s Motion for Order Compelling Immediate Assumption or Rejection of Agreement; or, in the Alternative, for Stay Relief (D.I. 1600, filed 1/7/25).

Objection Deadline: January 14, 2025, at 4:00 p.m. (ET).

Responses Received: None.

<sup>&</sup>lt;sup>1</sup> The debtors and debtors in possession in these chapter 11 cases, along with the last four digits of their respective employer identification numbers, are as follows: Great Basin, LLC (6158); Big Lots, Inc. (9097); Big Lots Management, LLC (7948); Consolidated Property Holdings, LLC (0984); Broyhill LLC (7868); Big Lots Stores - PNS, LLC (5262); Big Lots Stores, LLC (6811); BLBO Tenant, LLC (0552); Big Lots Stores - CSR, LLC (6182); CSC Distribution LLC (8785); Closeout Distribution, LLC (0309); Durant DC, LLC (2033); AVDC, LLC (3400); GAFDC LLC (8673); PAFDC LLC (2377); WAFDC, LLC (6163); INFDC, LLC (2820); Big Lots eCommerce LLC (9612); and Big Lots F&S, LLC (3277). The address of the debtors' corporate headquarters is 4900 E. Dublin-Granville Road, Columbus, OH 43081.

#### Related Documents:

- a) Declaration of Matthew Poole in Support of SquareTrade, Inc.'s Motion for Order Compelling Immediate Assumption or Rejection of Agreement; or, in the Alternative, for Stay Relief (D.I. 1601, filed 1/7/25) (the "SquareTrade Motion").
- b) Declaration of Eve H. Karasik in Support of SquareTrade, Inc.'s Motion for Order Compelling Immediate Assumption or Rejection of Agreement; or, in the Alternative, for Stay Relief (D.I. 1602, filed 1/7/25).

Status: On February 21, 2025, the Debtors filed the *Twelfth Notice of Rejection of Certain Executory Contracts and/or Unexpired Leases* [D.I. 2050] (the "Twelfth Rejection Notice"), which provides for rejection of the contract at issue in the SquareTrade Motion. On March 18, 2025, the Court entered an order [D.I. 2264] resolving this matter.

2. Debtors' Second Motion for Entry of an Order Extending the Debtors' Time to File Notices of Removal of Claims and Causes of Action Related to the Debtors' Chapter 11 Cases (D.I. 2196, filed 3/10/25).

Objection Deadline: March 18, 2025, at 4:00 p.m. (ET).

Responses Received: None

#### Related Documents:

- a) Certificate of No Objection Regarding Debtors' Second Motion for Entry of an Order Extending the Debtors' Time to File Notices of Removal of Claims and Causes of Action Related to the Debtors' Chapter 11 Cases (<u>D.I. 2308</u>, filed 3/20/25).
- b) Order Extending the Debtors' Time to File Notices of Removal of Claims and Causes of Action Related to the Debtors' Chapter 11 Cases (<u>D.I. 2314</u>, entered 3/20/25).

Status: An order has been entered. A hearing on this matter is no longer necessary.

## **ADJOURNED MATTERS**

3. Gerald Bogle's Motion for Relief from the Automatic Stay (D.I. 672, filed 10/31/24).

Objection Deadline: November 14, 2024, at 4:00 p.m. (ET); extended to March 21, 2025, at 11:59 a.m. for the Debtors.

Responses Received: None at this time.

Related Documents: None.

<u>Status</u>: This matter is adjourned to the next omnibus hearing.

4. Motion of Amy Eskra-Brown for Relief from Bankruptcy Automatic Stay to Proceed Against Insurance Proceeds (D.I. 674, filed 10/31/24).

Objection Deadline: November 14, 2024, at 4:00 p.m. (ET).

# Responses Received:

a) Debtors' Omnibus Objection to Motions for Relief from Automatic Stay Under Section 362 of the Bankruptcy Code (D.I. 1103, filed 11/14/24).

#### **Related Documents:**

- a) Notice of Hearing in Support of Motion for Relief from Stay (D.I. 858, filed 11/4/24).
- b) Declaration of Jonathan Caruso in Support of Debtors' Omnibus Objection to Motions for Relief from Automatic Stay Under Section 362 of the Bankruptcy Code (D.I. 1352, filed 12/16/24).

<u>Status</u>: This matter is adjourned to the next omnibus hearing.

5. Motion of Carol Donnelly for Relief from Bankruptcy Automatic Stay to Proceed Against Insurance Proceeds (D.I. 676, filed 10/31/24).

Objection Deadline: November 14, 2024, at 4:00 p.m. (ET).

## Responses Received:

a) Debtors' Omnibus Objection to Motions for Relief from Automatic Stay Under Section 362 of the Bankruptcy Code (D.I. 1103, filed 11/14/24).

## **Related Documents:**

- a) Notice of Hearing in Support of Motion for Relief from Stay (D.I. 861, filed 11/4/24).
- b) Declaration of Jonathan Caruso in Support of Debtors' Omnibus Objection to Motions for Relief from Automatic Stay Under Section 362 of the Bankruptcy Code (D.I. 1352, filed 12/16/24).

<u>Status</u>: This matter is adjourned to the next omnibus hearing.

6. Motion of Belkis Millan for Relief from the Automatic Stay (D.I. 1625, filed 1/7/25).

Objection Deadline: January 14, 2025, at 4:00 p.m. (ET).

Responses Received: None.

Related Documents: None.

Status: This matter is adjourned to the next omnibus hearing.

7. Motion of Katie J. Jennings and Allen Jennings for Relief from the Automatic Stay (D.I. 2047, filed 2/21/25).

Objection Deadline: March 18, 2025, at 4:00 p.m. (ET).

Responses Received: None at this time.

Related Documents: None at this time.

Status: This matter is adjourned to the next omnibus hearing.

8. Denzel Anderson's Motion for Relief from the Automatic Stay (D.I. 2201, filed 3/11/25).

Objection Deadline: March 18, 2025, at 4:00 p.m. (ET).

Responses Received: None at this time.

Related Documents: None at this time.

Status: This matter is adjourned to the next omnibus hearing.

# **MATTERS UNDER CERTIFICATION**

9. Application of AlixPartners, LLP for Approval of Completion Fee (D.I. 2051, filed 2/21/25).

Objection Deadline: March 14, 2025, at 4:00 p.m. (ET); extended to March 20, 2025, for the U.S. Trustee.

# Responses Received:

a) Informal comments received from the Office of the United States Trustee (the "<u>U.S.</u> <u>Trustee</u>").

#### Related Documents:

a) Certification of Counsel Regarding Application of AlixPartners, LLP for Approval of Completion Fee (D.I. 2325, filed 3/20/25).

<u>Status</u>: On March 20, 2025, AlixPartners submitted a certification of counsel with respect to this matter. Accordingly, a hearing on this matter is only necessary if the Court has questions.

10. Motion of the American Bottling Company to Modify the Automatic Stay Pursuant to Section 362(d) of the Bankruptcy Code (D.I. 2205, filed 3/11/25).

Objection Deadline: March 18, 2025, at 4:00 p.m. (ET).

Responses Received: None

# **Related Documents:**

a) Certification of No Objection Regarding D.I. No. 2205 (D.I. 2304, filed 3/20/25).

<u>Status</u>: On March 20, 2025, the American Bottling Company submitted a certificate of no objection with respect to this matter. Accordingly, a hearing on this matter is only necessary if the Court has questions.

# **MATTERS GOING FORWARD**

11. Notice of Filing of Fifth Post-Closing Designation Notice (D.I. 1923, filed 2/3/25).

Objection Deadline: February 18, 2025, at 4:00 p.m. (ET).

#### Responses Received:

- a) [Withdrawn] Objection to Cure Amount for Assumption and Assignment of Lease (D.I. 1977, filed 2/12/25).
- b) Limited Objection of Sun Point SDC, LLC to Debtors' Proposed Assumption and Assignment of Lease, Including Cure Amount, and Reservation of Rights (D.I. 1985, filed 2/13/25).
- c) Limited Objection of Lee's Crossing SDC, LLC to Debtors' Proposed Assumption and Assignment of Lease, Including Cure Amount, and Reservation of Rights (D.I. 1986, filed 2/13/25).
- d) Objection of Sevierville Forks Partners, LLC and Harrison OH Partners, LLC to Debtors' Fifth Post-Closing Designation Notice (D.I. 1993, filed 2/17/25).

- e) Objection of 5 Point Church to Fifth Post-Closing Designation Notice (<u>D.I. 1995</u>, filed 2/18/25).
- f) Objection of Aston Properties, Inc to Debtors Proposed Cure Amount and Assumption and Assignment of Leases to Variety Stores (D.I. 1996, filed 2/18/25).
- g) Limited Objection and Reservation of Rights of Food Lion LLC to Debtors' Notice of Filing of Fifth Post-Closing Designation Notice (D.I. 1999, filed 2/18/25).
- h) Objection of Gibraltar Management Co., Inc., National Realty & Development Corp., and Gator Development Corp. to Notice of Filing of Fifth Post-Closing Designation Notice (D.I. 2000, filed 2/18/25).
- i) Objection of DGN Properties LLC to Debtors' Proposed Assumption and Assignment of Lease and Proposed Order (D.I. 2001, filed 2/18/25).
- j) Limited Objection by BVB-NC, LLC to Debtor's Notice of Potential Assumption and Assignment of Executory Contracts or Unexpired Leases and Cure Amount (D.I. 2003, filed 2/18/25).
- k) Limited Objection of Ireland Lawrence, Ltd. to Debtor's Proposed Assumption and Assignment of Lease and Reservation of Rights (<u>D.I. 2005</u>, filed 2/18/25).
- l) The Marietta, Ohio Landlord's Objection to Fifth Post-Closing Designation Notice and Reservation of Rights (D.I. 2011, filed 2/19/25).
- m) The Brandon, Florida Landlord's Objection to Fifth Post-Closing Designation Notice and Reservation of Rights (D.I. 2015, filed 2/19/25).
- n) The Lancaster, Ohio Landlord's Objection to Fifth Post-Closing Designation Notice and Reservation of Rights (D.I. 2016, filed 2/19/25).
- o) The Grove City, Ohio Landlord's Objection to Fifth Post-Closing Designation Notice and Reservation of Rights (D.I. 2017, filed 2/19/25).
- p) Objection of Tranel Inc. and Horizon Commons, LLC to Debtors' Proposed Assumption and Assignment of Leases (D.I. 2019, filed 2/19/25).
- q) Limited Objection of Beacon Plaza, LLC to Assumption and Assignment of Lease and Fifth Post-Closing Designation Notice (D.I. 2028, filed 2/20/25).
- r) Limited Objection and Reservation of Rights of USPG Portfolio Eight, LLC to the Notice of Filing of Fifth Post-Closing Designation Notice (D.I. 2035, filed 2/20/25).

- s) Limited Objection and Reservation of Rights of F & F Investments, LLC, MFBG Port Huron, LLC, and NS Retail Holdings, LLC to Notice of Filing Fifth Post-Closing Designation Notice (D.I. 2041, filed 2/20/25).
- t) The Southern Benedictine Society of North Carolina's Limited Objection to Assumption and Assignment of Lease (D.I. 2042, filed 2/20/25).
- u) Limited Objection of R.L. Wittbold-New Philadelphia, LLC to Notice of Filing Fifth Post-Closing Designation Notice (D.I. 2054, filed 2/23/25).
- v) Objection of Simpsonville Plaza, LLC to Debtors' Fifth Post-Closing Designation Notice (D.I. 2076, filed 2/25/25).

#### **Related Documents:**

- a) Certificate of No Objection Regarding Fifth Post-Closing Designation Notice (D.I. 2083, filed 2/25/25).
- b) Order Pursuant to Sections 363 and 365 of the Bankruptcy Code Authorizing the Debtors-in-Possession to Assume, Assign and Sell Certain Non-Residential Real Property Leases (D.I. 2111, entered 2/27/25).
- c) [Withdrawn] Certification of Counsel Regarding Assumption and Assignment of Nonresidential Real Property Lease (D.I. 2181, filed 3/6/25).
- d) Certification of Counsel Regarding Assumption and Assignment of Nonresidential Real Property Leases (D.I. 2188, filed 3/7/25).
- e) Notice of Hearing Regarding Assumption and Assignment Objections Relating to Post-Closing Designation Notices (<u>D.I. 2208</u>, filed 3/11/25).
- f) Certification of Counsel Regarding Assumption and Assignment of Nonresidential Real Property Lease (D.I. 2246, filed 3/14/25).
- g) Certification of Counsel Regarding Assumption and Assignment of Nonresidential Real Property Leases (D.I. 2254, filed 3/17/25).
- h) Order Pursuant to Sections 363 and 365 of the Bankruptcy Code Authorizing the Debtors-in-Possession to Assume, Assign and Sell Certain Non-Residential Real Property Leases (D.I. 2270, entered 3/18/25).
- i) Order Pursuant to Sections 363 and 365 of the Bankruptcy Code Authorizing the Debtors-in-Possession to Assume, Assign and Sell Certain Non-Residential Real Property Leases (D.I. 2273, entered 3/18/25).

<u>Status</u>: This matter is going forward solely with respect to the pending objections listed herein.

12. Notice of Filing of Eighth Post-Closing Designation Notice (D.I. 1964, filed 2/10/25).

Objection Deadline: February 24, 2025, at 4:00 p.m. (ET).

#### Responses Received:

a) Objection of Steger Towne Crossing, LP to Notice of Filing of Eighth Post-Closing Designation Notice with Respect to Adequate Assurance of Future Performance and Proposed Cure (D.I. 2066, filed 2/24/25).

## **Related Documents:**

- a) Certification of Counsel Regarding Order Approving Assumption and Assignment of West Deptford Lease (D.I. 2160, filed 3/2/25).
- b) Order Pursuant to Sections 363 and 365 of the Bankruptcy Code Authorizing the Debtors-in-Possession to Assume and Assign a Certain Non-Residential Real Property Lease (D.I. 2167, entered 3/3/25).
- c) [Withdrawn] Certification of Counsel Regarding Order Approving Assumption and Assignment of Lakewood Lease (D.I. 2169, filed 3/4/25).
- d) [Withdrawn] Certification of Counsel Regarding Notice of Filing of Eighth Post-Closing Designation Notice (D.I. 2176, filed 3/4/25).
- e) Notice of Hearing Regarding Assumption and Assignment Objections Relating to Post-Closing Designation Notices (<u>D.I. 2208</u>, filed 3/11/25).
- f) Revised Certification of Counsel Regarding Order Approving Assumption and Assignment of Lakewood Lease (D.I. 2220, filed 3/12/25).
- g) [Withdrawn] Revised Certification of Counsel Regarding Notice of Filing of Eighth Post-Closing Designation Notice (D.I. 2231, filed 3/13/25).
- h) Order Pursuant to Sections 363 and 365 of the Bankruptcy Code Authorizing the Debtors-in-Possession to Assume, Assign and Sell Certain Non-Residential Real Property Leases (D.I. 2265, entered 3/18/25).
- i) Certification of Counsel Regarding Order Approving Assumption and Assignment of Miami Lease (D.I. 2281, filed 3/18/25).
- j) Second Revised Certification of Counsel Regarding Notice of Filing of Eighth Post-Closing Designation Notice (D.I. 2285, filed 3/18/25).
- k) Declaration of S. Susan Self, Vice President of Ritter Management, Inc., in Support of Objection of Steger Towne Crossing, LP to Notice of Filing of Eighth Post-

- Closing Designation Notice with Respect to Adequate Assurance of Future Performance and Proposed Cure (D.I. 2288, filed 3/19/25).
- 1) Order Pursuant to Sections 363 and 365 of the Bankruptcy Code Authorizing the Debtors-in-Possession to Assume, Assign and Sell Certain Non-Residential Real Property Lease (Store No. 4258) (D.I. 2294, entered 3/19/25).
- m) Order Pursuant to Sections 363 and 365 of the Bankruptcy Code Authorizing the Debtors-in-Possession to Assume, Assign and Sell Certain Non-Residential Real Property Leases (Store Nos. 4647, 1624 and 4430) (D.I. 2297, entered 3/19/25).
- n) Stegar Towne Crossing, LP's Witness and Exhibit List for the Hearing Scheduled on March 25, 2025 at 10:00 a.m. (ET) (D.I. 2324, filed 3/20/25).

<u>Status</u>: This matter is going forward solely with respect to the pending objections listed herein. The Debtors understand that Stegar Towne Crossing, LP, intends to present the testimony of S. Susan Self in support of its objection (D.I. 2066).

13. Notice of Filing of Tenth Post-Closing Designation Notice (D.I. 1994, filed 2/17/25).

Objection Deadline: March 3, 2025, at 4:00 p.m. (ET).

## Responses Received:

- a) Objection of DKR Investments, LLC to Debtors' Tenth Post-Closing Designation Notice (D.I. 2062, filed 2/24/25).
- b) Objection of MBM Investments, LLC to Debtors' Tenth Post-Closing Designation Notice (D.I. 2063, filed 2/24/25).
- c) Objection of TLM Realty Corp. to Debtors' Proposed Cure Amount and Assumption and Assignment of Lease to Ocean State Job Lot of DE2025, LLC (D.I. 2094, filed 2/26/25).
- d) Objection of EVP Auburn, LLC to Tenth Post-Closing Designation Notice (D.I. 2119, filed 2/28/25).
- e) Limited Objection to and Reservation of Rights in Connection with Notice of Filing of Tenth Post-Closing Designation Notice (D.I. 2161, filed 3/3/25).
- f) Objection of Safeway to Potential Assumption and Assignment of Unexpired Lease, Cure Amount, and Adequate Assurance (D.I. 2164, filed 3/3/25).

## **Related Documents:**

a) Notice of Hearing Regarding Assumption and Assignment Objections Relating to Post-Closing Designation Notices (D.I. 2208, filed 3/11/25).

- b) Order Pursuant to Sections 363 and 365 of the Bankruptcy Code Authorizing the Debtors-in-Possession to Assume, Assign and Sell Certain Non-Residential Real Property Leases (D.I. 2296, entered 3/19/25).
- c) Certification of Counsel Regarding Notice of Filing of Tenth Post-Closing Designation Notice (D.I. 2327, filed 3/21/25).

<u>Status</u>: This matter is going forward solely with respect to the pending objections listed herein. A certification of counsel [D.I. 2327] has been filed to resolve the objection filed at D.I. 2161.

14. Notice of Filing of Fifteenth Post-Closing Designation Notice (D.I. 2116, filed 2/27/25).

Objection Deadline: March 14, 2025, at 4:00 p.m. (ET); extended to March 21, 2025, at 4:00 p.m. (ET) for Big Score Investors Inc.

# Responses Received:

- a) Objection to Notice of Designation of Designated Asset and Motion for Allowance of Administrative Claim for Unpaid Post-Petition Lease Obligations and Directing Debtors' Immediate Payment of Such Claim (D.I. 2224, filed 3/13/25).
- b) Objection of DLC Properties, LLC to Fifteenth Post-Closing Designation Notice (D.I. 2235, filed 3/14/25).
- c) Objection Lebanon Marketplace Center, LLCs Objection to Debtors Notice of Filing of Fifteenth Post-Closing Designation Notice (D.I. 2237, filed 3/14/25).
- d) Objection of Landlord AP Growth Properties, LP to Proposed Cure for Store No. 1926 (1590 George Dieter, El Paso, Texas) and Limited Objection to Proposed Assumption and Assignment with Reservation of Rights (D.I. 2238, filed 3/14/25).
- e) Limited Objection of Millan Enterprises, LLC to Notice of Filing Fifteenth Post-Closing Designation Notice (D.I. 2243, filed 3/14/25).
- f) Objection of Gibraltar Management Co., Inc. and Gator Development Corp. to Notice of Filing of Fifteenth Post-Closing Designation Notice (<u>D.I. 2244</u>, filed 3/14/25).

## **Related Documents:**

- a) Notice of Hearing Regarding Assumption and Assignment Objections Relating to Post-Closing Designation Notices (D.I. 2208, filed 3/11/25).
- b) Certification of Counsel Regarding Notice of Filing of Fifteenth Post-Closing Designation Notice (D.I. 2302, filed 3/19/25).

- c) Order Pursuant to Sections 363 and 365 of the Bankruptcy Code Authorizing the Debtors-in-Possession to Assume, Assign and Sell Certain Non-Residential Real Property Leases (Store Nos. 30, 380, 493, 1076, 1187, 1189, 1238, 1266, 1286, 1370, 1375, 1433, 1562, 1664, 1836, 1864, 1959, 1977, 4488, 4651, 4740, 5161, 5248, 5318, 5465) (D.I. 2305, filed 3/20/25).
- d) Supplemental Notice of Hearing Regarding Assumption and Assignment Objections Relating to Post-Closing Designation Notices (D.I. 2326, filed 3/20/25).

<u>Status</u>: The parties are working to consensually resolve the outstanding objections in advance of the hearing and may seek to adjourn the matter to the next omnibus hearing.

15. Notice of Filing of Fourteenth Post-Closing Designation Notice (D.I. 2117, filed 2/28/25).

Objection Deadline: March 14, 2025, at 4:00 p.m. (ET).

### Responses Received:

- a) Objection of Rivercrest Realty Associates, LLC to Notice of Filing of Fourteenth Post-Closing Designation Notice (D.I. 2236, filed 3/14/25).
- b) Limited Objection of NS Retail Holdings, LLC to Notice of Filing of Fourteenth Post-Closing Designation Notice (D.I. 2245, filed 3/14/25).

## **Related Documents:**

- a) Notice of Hearing Regarding Assumption and Assignment Objections Relating to Post-Closing Designation Notices (D.I. 2208, filed 3/11/25).
- b) Certification of Counsel Regarding Fourteenth Post Closing Designation Notice (D.I. 2291, filed 3/19/25).
- c) Order Pursuant to Sections 363 and 365 of the Bankruptcy Code Authorizing the Debtors-in-Possession to Assume, Assign and Sell Certain Non-Residential Real Property Leases (D.I. 2300, entered 3/19/25).
- d) Certification of Counsel Regarding Assumption and Assignment of Nonresidential Real Property Leases (D.I. 2307, filed 3/20/25).
- e) Order Pursuant to Sections 363 and 365 of the Bankruptcy Code Authorizing the Debtors in Possession to Assume, Assign and Sell Certain Non-Residential Real Property Lease (D.I. 2315, filed 3/20/25).
- f) Supplemental Notice of Hearing Regarding Assumption and Assignment Objections Relating to Post-Closing Designation Notices (<u>D.I. 2326</u>, filed 3/20/25).

<u>Status</u>: This matter is going forward solely with respect to the pending objections listed herein.

16. Notice of Filing of Eighteenth Post-Closing Designation Notice (D.I. 2178, filed 3/5/25).

Objection Deadline: March 20, 2025, at 4:00 p.m. (ET).

# Responses Received:

- a) Objection of Madeira Plaza Power, LLC to Eighteenth Post-Closing Designation Notice (D.I. 2292, filed 3/19/25).
- b) Objection of 1255 Sunrise Realty, LLC to Debtors' Proposed Assumption and Assignment of Its Unexpired Lease in Eighteenth Post-Closing Designation Notice (D.I. 2293, filed 3/19/25).

# **Related Documents:**

- a) Notice of Hearing Regarding Assumption and Assignment Objections Relating to Post-Closing Designation Notices (D.I. 2208, filed 3/11/25).
- b) Supplemental Notice of Hearing Regarding Assumption and Assignment Objections Relating to Post-Closing Designation Notices (<u>D.I. 2326</u>, filed 3/20/25).

<u>Status</u>: This matter is going forward solely with respect to the pending objections listed herein. The proposed assignee has requested that the objection filed at D.I. 2293 be heard at this hearing. Counsel for the objecting landlord has indicated that they do not wish to go forward at this hearing.

Dated: March 21, 2025 Wilmington, Delaware

#### MORRIS, NICHOLS, ARSHT & TUNNELL LLP

/s/ Sophie Rogers Churchill

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